

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

LEAGUE OF UNITED LATIN AMERICAN
CITIZENS (LULAC), et al.,

Plaintiffs,

v.

GREGORY W. ABBOTT et al.,

Defendants.

Civil Action No. 3:21-cv-259
(DCG-JES-JVB)
(consolidated cases)

**TEXAS STATE CONFERENCE OF THE NAACP'S
SUPPLEMENTAL DESIGNATION OF TESTIFYING EXPERTS**

Pursuant to this Court's Order dated March 19, 2025 (Dkt. 880), Plaintiff Texas State Conference of the NAACP ("Texas NAACP") hereby supplements its designation of expert witnesses (Dkt. 303) to designate Dr. Monica Martinez as an additional testifying expert. Dr. Martinez is a historian at the University of Texas at Austin who will testify as to the history of discrimination in Texas, including the State's history of discriminatory election laws. Dr. Martinez previously submitted an expert report and materials related to these same issues on May 20, 2022 on behalf of the Fair Maps Plaintiffs (*see* Dkt. 306). As the Fair Maps Plaintiffs have now dismissed their claims in the above-captioned action, Texas NAACP is providing notice that Texas NAACP intends to rely on Dr. Martinez's May 20, 2022 report, with no supplementation or other changes to the report itself.

Dated: March 31, 2025

Respectfully submitted,

/s/ Lindsey B. Cohan
Lindsey B. Cohan
Texas Bar No. 24083903
DECHERT LLP
515 Congress Avenue, Suite 1400
Austin, TX 78701
(512) 394-3000
lindsey.cohan@dechert.com

David Rollins-Boyd*
Jennifer Nwachukwu*
Jeremy Lewis*
LAWYERS' COMMITTEE FOR
CIVIL RIGHTS UNDER LAW
1500 K Street, Suite 900
Washington, DC 20005
(202) 662-8600
drollins-boyd@lawyerscommittee.org
jnwachukwu@lawyerscommittee.org
jlewis@lawyerscommittee.org

Neil Steiner*
DECHERT LLP
1095 Avenue of the Americas
New York, NY 10036
(212) 698-3822
neil.steiner@dechert.com

Robert Notzon
Texas Bar No. 00797934
THE LAW OFFICES OF ROBERT
NOTZON
1502 West Avenue
Austin, TX 78701
(512) 474-7563
robert@notzonlaw.com

Janette M. Louard
Anthony P. Ashton
NAACP OFFICE OF THE GENERAL
COUNSEL
4805 Mount Hope Drive

Baltimore, MD 21215
(410) 580-5777
jlouard@naacpnet.org
aashon@naacpnet.org
abarnes@naacpnet.org
Attorneys appearing of counsel

**Admitted pro hac vice*

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was filed using the Court's ECF filing system on March 31, 2025, which will send notification of such filing to all counsel of record.

/s/ Lindsey B. Cohan
LINDSEY B. COHAN

Counsel for Plaintiff Texas NAACP